

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

NATHANIEL WATT,

Plaintiff,

-against-

NEW YORK CITY POLICE OFFICERS: PATRICK
GOURLAY and JOHN REDHEAD, and OFFICER
KEVIN BLACKETT, in their individual and official
capacities as employees of the City of New York,

Defendants.

**DECLARATION OF TOBIAS
E. ZIMMERMAN IN
SUPPORT OF DEFENDANT
POLICE OFFICERS' MOTION
TO DISMISS AND FOR
SUMMARY JUDGMENT**

No. 22-cv-06841 (AMD)(JAM)

TOBIAS E. ZIMMERMAN, declares, pursuant to 28 U.S.C. §1746, under penalty of perjury, that the following is true and correct:

1. I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants Patrick Gourlay and John Redhead. As such, I am familiar with the facts stated below and submit this declaration to place the relevant documents on the record in support of the Defendant Police Officers' Motion to Dismiss and for Summary Judgment.

2. Annexed hereto as **Exhibit "A"** is a true and correct copy of the Amended Complaint filed by Plaintiff on September 15, 2024.

3. Annexed hereto as **Exhibit "B"** is a true and correct copy of the New York City Police Department Omniform System Arrest Report for Plaintiff's arrest on November 19, 2019. This document was previously produced to Plaintiff's counsel during discovery, bearing Bates Numbers DEF001 to DEF003. The copy submitted has been redacted to remove Plaintiff's date of birth, home address, email address, and NYSID number.


4. Annexed hereto as **Exhibit “C”** is a true and correct copy of the New York City Police Department Medical Treatment of Prisoner form prepared in connection with the arrest of Plaintiff Nathaniel Watt on November 19, 2019. This document was previously produced to Plaintiff’s counsel during discovery, bearing Bates Numbers DEF004 to DEF005. The copy submitted has been redacted to remove Plaintiff’s home address and telephone number.

5. Annexed hereto as **Exhibit “D”** is a true and correct copy of the New York City Police Department Prisoner Movement Form prepared in connection with the arrest of Plaintiff Nathaniel Watt on November 19, 2019. This document was previously produced to Plaintiff’s counsel during discovery, bearing Bates Numbers DEF008 to DEF009. The copy submitted has been redacted to remove Plaintiff’s NYSID number.

6. Annexed hereto as **Exhibit “E”** is a true and correct copy of the Transcript of the deposition of Plaintiff Nathaniel Watt, taken by counsel for the Defendants on April 19, 2024. The copy submitted has been redacted to remove Plaintiff’s home address, partial birthdate, and partial social security number. Pursuant to the Court’s Individual Practices and Rules 4.B.ii, the full transcript is submitted, although Defendant Police Officers rely only on the portions expressly cited in their papers.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: New York New York,
June 6, 2025



Tobias E. Zimmerman
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (**via ECF**)